



State of Ohio Environmental Protection Agency

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FERNALD

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FILE:

George V. Voinovich
Governor

May 5, 1999

RE: PROJECT SPECIFIC PLAN
FOR AREA 1, PHASE II
EXCAVATION MONITORING
AND PRECERTIFICATION

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Ohio EPA has reviewed DOE's March 1999 submittal on the *Project Specific Plan for Area 1, Phase II Excavation Monitoring and Precertification*. The attachment gives DOE Ohio EPA's comments on the submittal.

If you have any questions, please contact Michelle Waller, Donna Bohannon, or me.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Ruth Vandergrift, ODH
Mark Shupe, HSI GeoTrans
Francie Barker, Tetra Tech EM Inc.
Manager, TPSS/DERR,CO

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**PROJECT SPECIFIC PLAN FOR AREA 1, PHASE II
EXCAVATION MONITORING AND PRECERTIFICATION**

Comments:

- 1) Commenting Organization: OEPA Commentor: OFFO
 Section #: 2.2 Pg. #: 2-2 Line #: 18-22 Code: C
 Original Comment #: The four physical samples planned for collection from the
 sludge drying beds are not a sufficient number of samples for the area. According
 to Figure 2-1, there is a gap in the center of the sludge drying beds that warrants
 more sampling to detect that all above-WAC material has been removed. Ohio EPA
 believes that two additional samples must be collected to confirm that the above-
 WAC Tc-99 contaminated material did not further contaminate the bed area. Also,
 since the removal of the above-WAC berm material is being determined only by
 visual observation, the berm must be sampled to ensure all above-WAC material
 has been removed.

- 2) Commenting Organization: OEPA Commentor: OFFO
 Section #: 3.1 Pg. #: 3-1 Line #: 12-13 Code: C
 Original Comment #:
 Comment: This section states that "The exact limits of the berm material classified
 as above-WAC will be determined based on field observations." What type of field
 observation will be used to make this decision? Please clarify.

- 3) Commenting Organization: OEPA Commentor: OFFO
 Section #: 3.2.1 Pg. #: 3-1 Line #: 25 Code: C
 Original Comment #:
 Comment: This line states that only two lifts are expected. An additional statement
 explaining that as many lifts as possible will be scanned needs to be added. Please
 correct.

- 4) Commenting Organization: OEPA Commentor: OFFO
 Section #: 3.3.9 Pg. #: 3.8 Line #: 18-19 Code: C
 Original Comment #:
 Comment: Again, this line references only two lifts. The reference either needs to be
 removed, or the possibility of more lifts added. Please correct.

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- 5) Commenting Organization: OEPA Commentor: OFFO
 Section #: Appendix A Pg. #: Line #: Code: C
 Original Comment #:
 Comment: Appendix A, the Data Quality Objectives, is missing. Please supply.